

Coordinated Review Effort

Section 110 of the Child Nutrition and WIC Reauthorization Act of 1989, Public Law 101-147, directed USDA to prescribe and administer a unified system for ensuring that school food authorities that participate in the National

School Lunch and Breakfast Programs comply with program regulations. The system, devised by USDA, unified the review activities of State Agencies (SA) and the Federal government to ensure that such efforts were not duplicated.

Table 1 Section 25 Review Criteria for Performance Standards

Performance Standards	How Standards Are Reviewed	Assessments
PS1. All free, reduced-price and paid lunches claimed for reimbursement are served only to children eligible for free, reduced-price and paid lunches, respectively; and are counted, recorded, consolidated and reported through a system which consistently yields correct claims.	The following will be evaluated: <ol style="list-style-type: none"> 1. Applications for which free or reduced reimbursement is claimed must be complete and correctly approved. 2. The number of free, reduced-price and paid lunches claimed is not more than the number of lunches served to children eligible for free, reduced-price and paid lunches. 3. A lunch counting system is being used which accurately counts, records, consolidates, and reports the reimbursable lunches served, by type. 4. Previous year's eligibility determination is not used after the first 30 days of school. 5. Direct certification from the Food Stamp Program or TANF Program is official and such children were enrolled in the school under review during the review period. 6. The system for issuing benefits and eligibility status is adequate and within established time frames. 	PS1 is violated if (A) a number of the reviewed schools have an inadequate system for certification, issuing benefits or updating eligibility status; or for counting, recording, consolidating or reporting lunches, by type; or (B) the SFA has an inadequate system for consolidating lunch counts, by type, or for reporting claims; or, if applicable for certification, issuing benefits or updating eligibility status. At both school and SFS level, a system for certification, issuing benefits, or updating eligibility status is inadequate if 10% or more are claimed incorrectly due to errors of certification, benefit issuance or updating of eligibility status.
PS2. Lunches claimed for reimbursement contain food items/components as required by program regulations.	Reviewers will: <ol style="list-style-type: none"> 1. Observe the serving line to determine whether all required food items/components are offered. 2. Observe a significant number of program lunches counted at the point of service for each type of serving line to review required number of food items/components. 3. Review menu records to determine whether all required food items/components have been offered. 	PS2 is violated if 10% or more of the total lunches observed in a SFA are missing one or more of the required food items/components.

*Depending upon the severity of the review findings, the State Agency reserves the right to establish an overclaim for an extended period of time.

Adapted from Mississippi Child Nutrition Programs, Policy and Procedure Manual 9/2000

State agencies are required to review all school food authorities that participate in the National School Lunch Program (NSLP) at least once during each 5-year cycle. As indicated in the review criteria segment below, the reviews are designed to assess compliance with program regulations pertaining to the implementation of free and reduced-price policy, the claiming of meals for Federal funds, and meeting meal requirements.

Review Criteria and Process

The Coordinated Review focuses on “critical” and “general” areas as shown in Table 1 Section 25. The critical areas include two specific Performance Standards:

- one that addresses eligibility and meal counting and claiming, and
- one that examines compliance with meal requirements.

If there are problems in either or both of the Performance Standards sections, corrective actions are taken and a potential for fiscal action exists. In the general areas of review, only corrective action is required.

Following a review, an exit conference is scheduled with the SFA superintendent and/or designated SFA representative to discuss the findings. The SFA is also provided a written report summarizing the findings, including any necessary adjustment of funds or reclaim of reimbursement monies. Fiscal

action is taken whenever Federal reimbursement has been paid to the SFA for ineligible meal benefits.

Review Period

The review period for the CRE and follow-up reviews must cover the most recent month for which a claim for reimbursement was submitted, provided that the claim for reimbursement covers at least 10 operating days.

Number of Schools to Review

At the minimum the SA shall review the number of schools specified in Table 2 Section 25.

School Selection Criteria

CRE requires that schools be targeted for review within the SFA based on the attendance level and the percentage of eligible free students participating. The SA must review all schools with a free average daily participation of 100 or more and a free participation factor of 100 percent or more.

Selection of additional schools to meet the minimum number of schools to review must be based on the following criteria:

- Elementary schools with a free ADP of 100 or more and free participation of 97% or more,
- Combination schools with a free ADP of 100 or more and free participation of 87% or more, and
- Secondary schools with a free ADP of 100 or more and free participation of 77% or more,

Elementary schools are defined as pre-school through 8th grade, secondary schools as 9th grade through 12th grade, and combination schools as a school with a combination of elementary and secondary grades.

Table 2 Section 25 Number of Schools to Review

Number of Schools in the SFA	Minimum Number of Schools to Review
1 to 5	1
6 to 10	2
11 to 20	3
21 to 40	4
41 to 60	6
61 to 80	8
81 to 100	10

If the minimum number is not met, the SA must select the remaining schools based on its criteria. These criteria may include:

- Low participation,
- Recommendation from a food service director,
- Findings from the on-site visits or the claims review process,
- Any school in which the daily lunch counts appear questionable,
- Identical or very similar claiming patterns, and/or
- Large changes in free lunch counts.

How to Prepare for a CRE

The records, data, and information listed below are needed at the time of the review:

- Free and reduced-price applications (including withdrawn, temporary and denied), and direct certification documentation,
- Benefit issuance document (i.e., roster, class list, checklist),
- Verification file available for school reviewed,
- An approved copy of the Free and Reduced-Price Policy Statement on file at the SFA office and each school plus three previous years,
- Documentation for the last reimbursement claim submitted (including participation and income records for all SFA schools),
- A copy of the school calendar indicating days of meal service,
- Menu records for the last claim submitted,
- Documentation of local on-site reviews of the meal counting and claiming procedures for each school, and

- Documentation of edit check process.

The reviewer(s) will examine the following program areas at the school(s) selected for review:

- The free and reduced-price meal applications and direct certification records in each school,
- Compare meals reported for reimbursement to number of correctly approved applications to determine any overclaims,
- Observe meal collection and count procedures for compliance with Policy Statement and proper implementation,
- Determine accuracy of meal count consolidation records, and
- Observe meal service to determine that meals served meet minimum requirements.

Review the following records at each school:

- Planning and production records (3 years plus current year),
- Student and/or parent involvement documentation, and
- Most recent health inspection report for food service operation, and
- Procurement procedures.

CRE Tracking Checklist

The Coordinated Review Effort (CRE) Tracking Checklist can be used by the SFA to evaluate its program. To be in compliance, SFA staff should be able to respond “yes” to the questions. If further explanation of each point is needed, a section reference from the Program Reference Manual appears in the left-hand column. The full size version of the tracking form can be found in Section 27.

South Carolina School Food Service Program Reference Manual

Section 25: Coordinated Review Effort

Form 1 Section 25

Section Reference	CRE Tracking Checklist	Yes	No
Determining Eligibility			
Section 9A	1. Are the district's free and reduced-price meal applications readily retrievable by school?		
Section 9A	2. Were the current year's application, notice/letter to households and eligibility guidelines used by each school in the district?		
Section 9A	3. Are the parents or guardians of all students enrolled in the district given a free and reduced-price meal application at the beginning of the school year?		
Section 9A	4. Does a review of the applications indicate that:		
	All income applications include:		
	Name(s) of student(s) for whom application is made?		
	Names of all household members?		
	Signature of an adult household member?		
	Social security number of the adult who signed the application or an indication that he/she does not have one (the word "none")?		
	Income of each adult household member, by source?		
	All food stamp/TANF applications include:		
	Name of student?		
	Valid food stamp/TANF number?		
	Signature of an adult household member?		
	All foster and institutionalized children are on individual applications?		
Section 9A	5. Was the correct eligibility determination made for each application processed?		

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Section Reference	CRE Tracking Checklist (continued)	Yes	No
Section 10	5. Is the verification process documented in some manner for each application selected?		
Section 10	6. Is the district summary form completed and on file?		
Section 10	7. Are households whose benefits must be reduced or terminated given the required 10-day notification prior to the change?		
Counting and Claiming			
Section 2	1. Is the meal count system in use at each serving site the same as the approved procedure indicated in the Policy Statement?		
Section 11	2. Is the medium of exchange for free, reduced-price and full-price meals:		
	Coded in a manner which does not cause overt identification of students receiving free and reduced-price meals? (Prohibited codes include color coding and use of obvious identifiers such as F, R and P).		
	Available through prepayment or charging thus making free and reduced-price meal recipients appear as students who have prepaid or charged? (Be sure to check the lunch and breakfast collection procedures).		
	Distributed using a common location at a common time for all students to obtain their tickets or tokens?		
	Collected in a manner which ensures that the same procedures are used for all categories of meals?		
Section 11	3. Is the count category taken at the point-of-service? (That point in the food service operation when a determination can accurately be made that a reimbursable free, reduced-price or full-price meal has been served to an eligible student). The end of the serving line is considered the "point-of-service".		
Section 11	4. Is there a system in place to ensure that second meals are not claimed for reimbursement?		

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Section Reference	CRE Tracking Checklist (continued)	Yes	No
Section 9A	6. Does the district have a system for handling temporarily approved applications (applications indicating "zero income" or unemployment) which includes:		
	Updating temporary applications by Nov. 15, Jan. 15, and March 15?		
	A process for notifying the household that their benefits will expire unless the information on the application is updated?		
	Termination of benefits if the household fails to respond?		
Section 2	7. Is the reviewing official the same as is indicated in the Policy Statement?		
Section 2	8. Is the hearing official as indicated on the Notice/Letter to Households the same as that indicated in the Policy Statement?		
Section 2	9. Is the hearing official a person who is not involved in the determination and/or verification process?		
Section 9A	10. Do students receive benefits based on last year's eligibility no longer than the first 30 operating days after the beginning of the school year?		
Section 2	11. Is a copy of the free and reduced-price meals policy statement available to each school in the district?		
Direct Certification			
Section 9B	1. Is the Notice of Predetermined Eligibility sent to the parent or guardian of each directly certified student?		
Section 9B	2. Is the date that the notice is sent noted beside the name of the student on the direct certification list or elsewhere?		
Verification			
Section 10	1. Was a count of meal applications on file on October 31 taken?		
Section 10	2. Were an adequate number of meal applications selected for verification?		
Section 10	3. Was all required documentation obtained during the verification process?		
Section 10	4. Was the verification process completed by December 15?		

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Section Reference	CRE Tracking Checklist (continued)	Yes	No
Section 11	5. After viewing the meal count procedure in operation, does it appear that it yields an accurate count by category? (It is important to observe the cashier(s) at the end of the serving period to ensure that the count as taken on the line is the same as that reported on the daily record. Perform the same procedures that the cashier performs [count the number of meals by category from the tickets, roster, etc.] and compare your numbers to the cashiers' reported numbers. Compare the counts by category taken on the day of the review to counts recorded for prior days that month to determine if they are reasonable).		
Section 11	6. If there is more than one serving line, are the counts from all lines properly consolidated?		
Section 11	7. Is the list of eligibles from which the medium of exchange is issued current?		
Section 9A	8. Do the names on the list of eligibles match approved applications on file and on the direct certification list?		
Section 9A	9. If more than one list is used, are all lists the same?		
Section 9A	10. Are the dates of changes due to withdrawals, transfers, etc. reflected on the list or on another tracking document?		
Section 11	11. Is the count of eligibles updated on a daily basis and in a timely manner?		
Section 10	12. Are changes in eligibility due to verification, etc. made:		
	Immediately for increases in benefits?		
	Immediately after the 10-day adverse notice period for decreases in benefits?		
Section 11, Section 8A	13. Are attendance-adjusted eligibles by category compared to daily meal counts for each school (claims review or edit check)?		
Section 11	14. When the daily meal counts by category exceed the ADA, is the validity of the count examined and documented prior to the submission of the claim?		
Section 11	15. Are all serving areas where meals are claimed for reimbursement available to all students (free, reduced-price and full paying students)?		

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Section Reference	CRE Tracking Checklist (continued)	Yes	No
Section 5	16. Are menus priced as a unit?		
Section 5	17. If reimbursable premium meals are offered, are free and reduced-price meal recipients given the option of receiving the premium meal at no additional charge?		
Section 5	18. Is the reduced-price breakfast \$3.30 or less and the reduced-price lunch \$.40 or less?		
Section 5	19. Do adult meal prices meet the state's minimum charge for the year?		
Section 5	20. Is there a trained substitute cashier?		
Section 11	21. When reviewing the daily record of meals served, are there counts that reflect patterns of numbers, repetition of numbers, constant counts by category, served count equal to delivered count, identical counts for breakfast and lunch, 100 percent participation, or category count exceeding the number of eligibles?		
	Are these situations researched for errors?		
	Are corrections made as required?		
Section 11	22. Are prepaid and charged meals counted on the day they are served, not the day the money is collected?		
Section 4	23. Is the recommended procedure for handling lost, stolen and misused meal tickets in place?		
Section 4	24. Are students issued one original and a minimum of three replacement meal tickets or are special meal arrangements allowed before a student is charged for the fourth replacement ticket?		
Section 4	25. Are all meals claimed intended to be eaten on campus or school-sponsored field trips?		
Section 11	26. When preparing the monthly reimbursement claim, are the numbers of meals claimed by category for all schools consolidated correctly?		

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Section Reference	CRE Tracking Checklist (continued)	Yes	No
Section 12B or 12C	6. If breaded fruit and/or vegetable products are used, is documentation with regard to their contribution to the meal pattern on file and do production records reflect adequate serving sizes?		
Section 12B or 12C	7. Is full-strength fruit juice contributing no more than one-half of the required serving size of fruit/vegetable component for lunch?		
Section 12B or 12C	8. Are utensils that yield standard-sized servings used for portioning all fruits and vegetables?		
Section 12B or 12C	9. Based on the menu system being used, are the required number of bread servings offered each week? Traditional FB Menu Planning Grades K-12: 8 servings/week Enhanced FB Menu Planning* Grades K-6: 12 servings/week Grades 7-12: 15 servings/week Optional K-3: 10 servings/week *One grain/bread per day for grades K-12 may be a grain-based dessert		
Section 12B or 12C	10. If purchased-prepared bread items are offered: Does each serving contain 14.75 grams of whole grain, enriched flour, meal, bran or germ products? Is documentation in the form of a label or product analysis sheet available to substantiate the product's credibility?		
Section 12B or 12C	11. Is milk available on every reimbursable line throughout the entire serving period? (If a specific type of milk represents less than one percent of the total amount of milk consumed in the previous year, the school may elect not to offer that type of milk for lunch.)		
Section 12B or 12C	12. If there are choices of milk, is each student permitted to make his selection? (Milk should not be placed on a student's tray without permitting him/her to choose.)		
Section 12B or 12C	13. Are all required components offered in sufficient amounts before the cashier counts the meal as reimbursable?		

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Section Reference	CRE Tracking Checklist (continued)	Yes	No
On-Site Reviews			
Section 8C	1. Is an on-site review of the meal counting and claiming procedure completed and documented prior to February 1?		
	Is corrective action of the counting and claiming procedure developed as needed?		
	Is a follow-up review conducted within 45 days to ensure that corrective action was taken?		
Section 16	2. Is an on-site review of the afterschool snack program completed and documented according to regulatory guidelines two times per year?		
Meeting Meal Pattern Requirements			
Enhanced Food Based and Traditional Food Based			
Section 12B or 12C	1. If using the Traditional or the Enhanced Food Based Menu Planning System: Are each of the required five food items offered on every lunch menu? Are each of the required four food items offered on every breakfast menu?		
Section 12B or 12C	2. Is documentation with regard to the contribution of all purchased-prepared meat/meat alternate food items on file? (Documentation may be a CN label or a product analysis.)		
Section 12B or 12C	3. Are the purchased-prepared items documented in question #2 the same as those received, prepared and served in all of the district kitchens?		
Section 8A	4. Are food production records maintained on all meals claimed for reimbursement including breakfasts, food bars and various other serving lines? (Requirements include menu, portion size, number of portions planned, quantity prepared in purchase units, number served, and amount leftover).		
Section 8A	5. Are substitutions made in the menu reflected on the production records?		

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Section Reference	CRE Tracking Checklist (continued)	Yes	No
Section 12B or 12C	14. If the school is operating under offer versus serve, may a student refuse any one or two of the food items offered?		
Section 14	15. Are carbonated beverages, pure sugar candies, pure water ices and gums excluded from sales in the food service area during meal periods?		
NuMenus and Assisted NuMenus			
Section 12D	16. If using NuMenus or Assisted NuMenus Menu Planning System: Does the menu offered provide at least an entree, milk and side dish offered at lunch? Are milk and at least two other menu items offered at breakfast?		
Section 12D	17. Are menus being analyzed using USDA-approved software?		
Section 8B	18. Are food production records maintained on all meals claimed for reimbursement including breakfasts, food bars and various other serving lines? (Requirements include menu, portion size, number of portions planned, quantity prepared in purchase units, number served, and amount leftover).		
Section 8B	19. Are substitutions made in the menu reflected on the production records?		
Section 12D	20. Are utensils that yield standard-sized servings used for portioning all fruits and vegetables?		
Section 12D	21. If the school is operating under offer versus serve for lunch: Has the student selected an entree and at least one other item? Has the student declined no more than two items when four or more items are offered?		
Section 14	22. Are carbonated beverages, pure sugar candies, pure water ices and gums excluded from sales in the food service area during meal periods?		

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Section Reference	CRE Tracking Checklist (continued)	Yes	No
Civil Rights			
Section 3	1. Is the USDA/FNS-approved poster displayed in a prominent place in the school where it is visible to recipients?		
Section 9 and Section 3	2. Is the nondiscrimination statement and information as to where a complaint may be filed included on program materials?		
	Did the district send out a public release to the media and community/grass roots organizations that includes the letter to parents, application form and the complete income eligibility guidelines?		
	Was a copy of the letter of transmittal or a copy of the newspaper article kept as documentation?		
Section 2 and Section 3	3. If a significant number of persons in the community speak a language other than English, are foreign language translations available?		
Section 3	4. Are procedures established to receive complaints alleging discrimination?		
Section 3	5. Is there no separation by race, color, gender, religion, disability, age or national origin in the eating periods, seating arrangements, serving lines or eating areas?		
Section 13	6. Are disabled/special needs students provided program benefits as prescribed by regulations?		
Record Keeping			
Section 8A	1. Are records maintained for a period of three years, plus the current fiscal year or until resolution of any audits or reviews?		
Section 8A	2. Does the record-keeping system separate program income by adults and students?		
Section 6 and Section 8D	3. Are program expenditures kept by food, labor or other?		
Section 15	4. Does the district have a documented plan for student and parent involvement?		

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Section Reference	CRE Tracking Checklist (continued)	Yes	No
Fiscal Management			
Section 6	1. Was the remaining fund balance carried forward from last year to this year?		
Section 6	2. Net cash resources:		
	Are the food service account's net cash resources less than three month's operating expenditures?		
	If not, is documentation on file explaining reason for exceeding?		
Section 6	3. Is interest earned on invested school food service funds credited to the school food service account?		
Section 6	4. Do all employees paid from the school food service account have direct responsibility to the operation of the programs?		
Procurement			
Section 21	1. Did the district use competitive procedures on purchases of \$10,000 or more?		
Section 21	2. Did the district keep records on negotiated items costing \$10,000 or more (including justification of negotiation, contractor selection and basis for the cost of price negotiated)?		
Section 21	3. Is the district purchasing items as awarded?		